

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**CIVIL ACTION NO. 04-10493 GAO**

MANUEL ROSA  
Plaintiff,

v.

CITY OF BOSTON,  
Defendant.

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**JOINT MOTION TO EXTEND FACT DEPOSITION DEADLINE**

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Now come the parties and respectfully move this Honorable Court, pursuant to Fed. R. Civ. P. 6(b) to extend the fact deposition deadline. As grounds for its motion, the parties state:

1. The fact deposition deadline for this case is August 30, 2005.
2. Defendant's counsel is newly assigned to the case, having filed an appearance on July 15, 2005.
3. Defendant's counsel noticed the deposition of the Plaintiff for August 25, 2005, but because of the schedules of counsel, the parties were unable to agree on a date in August 2005.
4. The parties request an additional 31-day extension to complete depositions.
5. Allowing this motion will not prejudice any party to the action and will further the interests of justice.

WHEREFORE: The parties respectfully request this Honorable Court allow their motion to extend the fact deposition deadline until September 30, 2005.

Respectfully Submitted,

PLAINTIFF, Manuel Rosa,  
By his Attorney,

/s/ Arthur L. Kelly / aea

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DATED: 8/24/05

DEFENDANT, City of Boston,  
By its attorney,

/s/ Amy E. Ambarik

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DATED: 8/24/05